

# EXHIBIT B

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*Attorney for Plaintiff/Counterclaimant*  
*Labor Smart, Inc. and Third-Party Defendants*

**IN THE UNITED STATES DISTRICT COURT  
IN AND FOR THE DISTRICT OF ARIZONA**

Labor Smart, Inc,

Plaintiff,

v.

Jason Tucker et al.,

Defendants.

Case No. 2:22-cv-00357-PHX-JJT

**DECLARATION OF JOE PAVLIK**

I, Joe Pavlik, hereby declare, under penalty of perjury, that the following is true and correct.

1. I currently live in Cleveland, Ohio.
2. I am the primary caregiver for my parents. My father is 79 and my mother is 73.
3. My parents are both ill and I assist in their daily care. I see them on a daily basis.
4. I take my parents to all of their doctor's appointments, assist in preparation of their meals and taking of all of their medications.
5. Traveling to Tucson, Arizona for the Settlement Conference would be a personal hardship for both my parents and myself.
6. If I have to travel to Tucson, my parents will be left alone without anyone to care for them, and their health and care would be compromised if I was not present.

1           7.     My interests in this case align with those of Mr. Holley and Mr. Zarro, who I  
2 understand will personally be present at the Settlement Conference.

3           8.     I am able to attend the Settlement Conference virtually and will do so.

4           9.     I declare under penalty of perjury that the foregoing is true and correct.  
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6                   **DATED** this 28<sup>th</sup> day of May, 2025.

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8                   /s/ Joe Pavlik

9                   JOE PAVLIK  
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